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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC - MAIL ROOM

In the Matter of)
)
Amendment of Part 97 of the Rules)
Governing the Amateur Radio Services)
Concerning Reduction of Morse Code)
Speed Requirements for Amateur Extra)
and General License Classes with)
Attendant Reduction in Classes of)
Licensing from Five to Three)

RM-_____

To: The Commission

PETITION FOR RULE MAKING

Pursuant to Section 1.401 of the Commission's Rules, I, the undersigned Rolf Jespersen hereby respectfully requests that the Commission issue a Notice of Proposed Rule Making at an early date, effecting changes in Part 97 of the Commission's Rules governing the Amateur Radio Services in accordance with the attached appendix.

The emphasis on examination in the ability to copy Morse code by ear ought to be minimized. In light of dwindling use of this mode, and increased use of modes such as digital data transmissions it would be equally relevant to demonstrate skills in typing, such as: THE QUICK BROWN FOX JUMPS OVER THE LAZY DOG on a keyboard with blank keytops and only one error allowed.

Morse code was abandoned by the U.S. Coast Guard as of August 1st, 1993, discontinuing the monitoring for distress signals on 500 KHz, the International distress calling frequency. This marked the end of a nearly one

hundred year old era. The use of Morse code was considered obsolete since ocean going vessels are now required to carry automatic distress signalling equipment. This Global Maritime Distress and Safety System (GMDSS) is satellite based and determines where help is needed with the push of a button. Such equipment will float free if the vessel should sink suddenly. The U.S. Coast Guard continues to monitor voice channels as in the past.

The Boy Scouts of America abandoned Morse code for their Merit Badge Program in 1991.

Personally, I used to be a Maritime Radio Telegrapher, First Class, and have Morse code "in my blood". I still think it is fun to operate CW by hand key, mechanical "bug", electronic keyer or (preferably) computer keyboard. Since 1945, when I learned my first Morse code, I have been involved in training and/or examining more than 500 individuals in Morse code, electricity and magnetism, electronic theory, radio theory, digital circuits, instrumentation, operating practice, and computer usage. I am also active in the Volunteer Examiner program, and operate my own Packet Radio Bulletin Board, for the purpose of exchanging messages via Ham Radio by computer on a local and World Wide basis.

The Amateur Radio licensing structure has been exceedingly complex since the introduction of the Incentive Licensing in 1967/68. This produced a lot of

ill will since it stripped a great number of General Class licensees of part of their established privileges. They had to be examined for upgrades to Amateur Extra Class in order to regain their losses. I did so, myself, in 1967. A sizeable number of licensees are still around who never upgraded at all or stopped at the Advanced License level because of difficulties in mastering 20 words per minutes Morse Code. Nearly all of these, myself included, remember incentive licensing with bitterness. The many stages of upgrading have caused great expenses for the FCC Licensing Division in Gettysburg.

Three license grades could be accomplished as follows:

Amateur Extra Class: Elements 1(B) or 1(C), 2, 3A, 3B, 4A and 4B.

General Class: Elements 1(A) or 1(B) or 1(C), 2, 3A and 3B.

Technician Class: Elements 2 and 3A.

Volunteer Examiner Certificates of Successful Completion of Examination will continue to be issued, but not submitted to FCC for license upgrades until the various elements for the desired license have been completed.

In checking with Mr. Mike Landis of FCC Gettysburg, PA Licensing Division, a reduction of 15,000 upgrade operations per year will save the FCC one half man-year per year.

With the many modes of operation we have available

today, there is a minimal number of Amateur Radio licensees who take to Morse code operation as a mode they enjoy. Voice and/or computer operating modes are greatly preferred. Also, many struggle to pass the 20 words per minute Morse code tests just to get the Amateur Extra Class license to qualify for Volunteer Examiner but in short order lose their ability to copy Morse code.

The proposed changes would put us in step with most other countries in the World. The new and/or reworked question pools can be handled as the Volunteer Examiner Coordinator Question Pool Committee rework these in their four year cycle which this way can be put on a three year cycle. I suggest that Elements 2 Novice Theory and 3(A) Technician Theory be combined into one 500 question pool, with examination in 50 questions and at least 37 questions answered correctly to pass. For Element 3(B) General Theory the question pool ought to be expanded to 500 questions, again with examination in 50 questions. For the Amateur Extra Theory, Elements 4(A) Advanced and 4(B) Amateur Extra Class could also be combined into a 500 question pool with examination in 50 questions. The Topics of the questions could continue to be as in the current question sets, except expanded to match the 50 question requirements.

The currently licensed amateurs would continue to keep their license grades, unless they want to upgrade to the next higher license level by passing examinations in the

required elements.

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Respectfully submitted, FCC - MAIL ROOM

Rolf Jespersen

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November 4th, 1993

APPENDIX

Section 97.501 Qualifying for an amateur operator license.
Change to read as follows:

(a) Amateur Extra Class operator: Elements 1(B) or
1(C), 2, 3(A), 3(B), 4(A) and 4(B).

(b) Deleted.

(c) General Class operator: Elements 1(A), 1(B) or
1(C), 2, 3(A) and 3(B).

(d) Technician Class operator: Elements 2 and 3(A).

(e) Deleted.